

## REMARKS

Claims 1-16 and 18-19 are pending in this application. By this Amendment, claims 1, 2, 8, 9, 15, and 18 have been amended; claim 17 has been canceled. These amendments and cancellations are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Reconsideration in view of the above amendments and following remarks is respectfully requested.

In the Office Action, claims 1-3, 5-10, and 12-18 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gryglewicz (US Patent No 6,993,502) in view of Wilmes et al. (US Patent No 7,313,538). Claims 4, 11, and 19 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gryglewicz in view of Wilmes and further in view of Sullivan (US Publication No. 2003/0055754 A1). Applicants submit that the claimed subject matter is allowable for the reasons that follow.

With respect to independent claim 1, Applicants respectfully assert that Gryglewicz in view of Wilmes fail to teach or suggest each and every feature of the claimed invention. For example, these references do not teach, *inter alia*, “a translator for translating the tax calculation requests from the industry standard format to the non-industry standard format required for the selected tax calculator of the plurality of tax calculators.” See claim 1. The Office points to Col. 26, line 48 – Col. 27, line 17 and Col. 37, lines 25-36 of Gryglewicz in support of this rejection. See Final Office Action, page 3. However, Col. 26, line 48 – Col. 27, line 17 of Gryglewicz describes the tax computing engine 70 and only discloses that the tax computing engine 70 Appl. No. 10/654,665

calculates taxes from sales transaction data supplied by merchants. Although Col. 37, lines 25-36 of Gryglewicz discloses a translation, it is a translation of the tax code or criteria for the tax authority; it is not a translation of the tax calculation request. Therefore, Gryglewicz fails to teach the translator and translation of claim 1.

Applicants also assert that Gryglewicz in view of Wilmes fails to teach or suggest “receiving tax calculation requests in an industry standard format” and “translating the tax calculation request from the industry format to the non-industry format required for the selected tax calculator.” See claim 1. In other words, the cited references fail to distinguish between a format that the request is received in and the format that the calculators receive the requests in. Further, the references fail to teach that each calculator has a required non-industry standard format.

Moreover, Applicants submit that Gryglewicz in view of Wilmes fail to teach or suggest “a table update system configured to receive updates for the plurality of tax tables and update the plurality of tax tables.” See claim 1. The Office admits that Gryglewicz fails to teach this feature. See Final office Action, page 3. However, the Office points to Col. 6, lines 40-60 of Wilmes as allegedly teaching this feature. See *Id.* Applicants respectfully disagree. While Wilmes does provide tax tables, Wilmes fails to disclose that the tax tables are updateable.

In view of the arguments presented above, Applicants assert that the cited references fail to teach or suggest each and every feature of claim 1.

Applicants submit that the Office presented similar rejections with respect to independent claims 8 and 15. Accordingly, Applicants have made similar amendments to these claims and reassert the arguments presented above with respect to claims 8 and 15. Applicants contend that Appl. No. 10/654,665

claims 8 and 15 are not disclosed by Gryglewicz in view of Wilmes. Furthermore, since claims 2-7, 9-14, 16, and 18-19 depend from claims 1, 8, and 15, respectively, Applicants respectfully submit that these claims are also not disclosed by Gryglewicz in view of Wilmes. Applicants respectfully request that the Office withdraw the rejection of all claims.

## CONCLUSION

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, he is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

/Elaine Chi/

---

Elaine Chi  
Reg. No.: 61,194

Date: March 23, 2009

Hoffman Warnick LLC  
75 State Street, 14<sup>th</sup> Floor  
Albany, New York 12207  
Telephone (518) 449-0044  
Facsimile (518) 449-0047